

EXHIBIT 28

Stephanie H. Wilson Crespo (Mother)

9915 Cypress Creek Prkw #1606

Houston, TX 77070

(936) 207-2791

Stephaniewilsoncrespo42@gmail.com

Debtor's name: Commonwealth of Puerto Rico, 17-DK-03283 (LTS)

Department of Education

Claim # 87128, 87771, 94832

Omnibus Objection, 30050

Reason: (/illegible/ document)

Services denied from the Department of Education (87771)

Services denied to my children, Haddasaliz Velazquez Wilson, Armando Velazquez Wilson (94832)

Good morning!

I am requesting that my claims not be removed from the system. I would like to continue with my claims.

Thank you!

Stephanie H. Wilson Crespo

7/7/2021

Stephanie H. Wilson Crespo

RECEIVED AND FILED
CLERK'S OFFICE
U.S. DISTRICT COURT
SAN JUAN, PR
2021 JUL 15 PM 3:02

IF YOUR CLAIM IS LISTED HERE, ONE OR MORE OF THE DEBTORS ARE SEEKING TO DISALLOW YOUR CLAIM FOR THE REASON LISTED BELOW.

NAME	CLAIM #	DATE FILED	DEBTOR	ASSERTED CLAIM AMOUNT
Wilson Crespo, Stephanie H	94832	6/29/2018	Commonwealth of Puerto Rico	\$160,000.00
Reason:	This claim is duplicative of Master Claim no. 29477, which was filed on behalf of all plaintiffs in the litigation captioned Rosa Lydia Velez v. Puerto Rico Department of Education, KPE1980-1738 (the "Velez Master Claim"), by the attorney representing plaintiffs in that litigation. The plaintiffs in the litigation are parents of minors belonging to the Special Education Program of the Department of Education ("DE") who sought to compel the DE to comply with certain federal and state obligations relating to special education programs. Claimant is a plaintiff in that litigation, and his/her claim asserts the above-referenced litigation and/or liabilities associated with this litigation as its basis.			

SI SU RECLAMO ESTÁ INCLUIDO AQUÍ, UNO O MÁS DE LOS DEUDORES SOLICITAN QUE SU RECLAMO SEA RECHAZADO POR LA RAZÓN INDICADA AQUÍ ABAJO.

NOMBRE	N.º DE RECLAMACIÓN	FECHA DE PRESENTACIÓN	DEUDOR	MONTO DE LA RECLAMACIÓN ALEGADA
Wilson Crespo, Stephanie H	94832	6/29/2018	Commonwealth of Puerto Rico	\$160,000.00
Base para:	Este reclamo es un duplicado del Reclamo maestro n.º 29477, que fue interpuesto en nombre de todos los demandantes de la causa caratulada Rosa Lydia Velez contra el Departamento de Educación de Puerto Rico KPE1980-1738 (el "Reclamo maestro de Velez"), por los abogados apoderados de los demandantes en dicho pleito. Los demandantes del pleito son padres de menores que pertenecen al Programa de Educación Especial del Departamento de Educación ("DE"), que pretendían exigirle a dicho departamento que cumpliera con determinadas obligaciones federales y estatales relacionadas con programas de educación especial. El demandante es un actor de ese litigio y su reclamo invoca como fundamento el litigio y las obligaciones asociadas a este referidas más arriba.			

(/illegible/)

(29477)

1,185

/illegible/

(Other)

IF YOUR CLAIM IS LISTED HERE, ONE OR MORE OF THE DEBTORS ARE SEEKING TO DISALLOW YOUR CLAIM FOR THE REASON LISTED BELOW.

NAME	CLAIM #	DATE FILED	DEBTOR	ASSERTED CLAIM AMOUNT
Wilson Crespo, Stephanie H	87771	6/29/2018	Commonwealth of Puerto Rico	\$0.00
Reason:	This claim is duplicative of Master Claim no. 29477, which was filed on behalf of all plaintiffs in the litigation captioned Rosa Lydia Velez v. Puerto Rico Department of Education, KPE1980-1738 (the "Velez Master Claim"), by the attorney representing plaintiffs in that litigation. The plaintiffs in the litigation are parents of minors belonging to the Special Education Program of the Department of Education ("DE") who sought to compel the DE to comply with certain federal and state obligations relating to special education programs. Claimant is a plaintiff in that litigation, and his/her claim asserts the above-referenced litigation and/or liabilities associated with this litigation as its basis.			

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NAME	CLAIM #	DATE FILED	DEBTOR	ASSERTED CLAIM AMOUNT
Wilson Crespo, Stephanie H.	87128	6/29/2018	Commonwealth of Puerto Rico	\$0.00
Reason:	This claim is duplicative of Master Claim no. 29477, which was filed on behalf of all plaintiffs in the litigation captioned Rosa Lydia Velez v. Puerto Rico Department of Education, KPE1980-1738 (the "Velez Master Claim"), by the attorney representing plaintiffs in that litigation. The plaintiffs in the litigation are parents of minors belonging to the Special Education Program of the Department of Education ("DE") who sought to compel the DE to comply with certain federal and state obligations relating to special education programs. Claimant is a plaintiff in that litigation, and his/her claim asserts the above-referenced litigation and/or liabilities associated with this litigation as its basis.			

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11,185

L-HR-U

Prime Clerk LLC
(844) 822-9231 PRClaimsInfo@primeclerk.com

PROOF OF CLAIM NUMBER UNDER PROMESA: **[Redacted]**

Claimant's Name: **[Redacted]**

Please send the completed form by February 22, 2019, via email to PRClaimsInfo@primeclerk.com, or by mail, hand delivery, or overnight mail to the following address:

Commonwealth of Puerto Rico Supplemental Information Processing Center
850 3rd Avenue, Suite 412
Brooklyn, NY 11232

Any additional information you may provide will be attached to your claim and will appear in the official claims register.

BASIS FOR YOUR CLAIM:

- ☐ A pending or closed legal action with or against the government of Puerto Rico
- ☐ Current or former employment with the Government of Puerto Rico
- ☒ Other (please describe): Claim for Damages against the Department of Education and the Government of Puerto Rico (Special Education Lawsuit)
- ☐

FOR A LEGAL ACTION

Have you initiated a legal action? (Y)/ N

If the answer is yes, please fill out the sections below. If the answer is No, attach a written notice of your intent to file a claim, along with proof of mailing and contact information for your attorney, if available.

Identify the department or agency that is a party to the action: Department of Education and Government of Puerto Rico

Identify the name and address of the court or agency where the action is pending: Trial Court of San Juan,, Room 805

Case Number: KPE 1980-1738

Title, Caption, or Name of Case: Rosa Lydia Vélez et al v. Dept. of Education et al (Special Ed Lawsuit)

Status of the Case (pending, on appeal, or concluded): Pending

Do you have an unpaid judgment? Yes / (No) If yes, what is the date and amount of the judgment?

FOR CURRENT OR PRIOR EMPLOYMENT:

Specific agency or department where you were or are employed: _____

Specific period of prior or present employment related to your claim: _____

Last four digits of your social security number: _____

[continues in the back]

Nature of your employment claim:

- | | |
|---------------------------------------|---|
| <input type="checkbox"/> Retirement | <input type="checkbox"/> Union Grievance |
| <input type="checkbox"/> Unpaid Wages | <input type="checkbox"/> Pending or closed legal action |
| <input type="checkbox"/> Sick Days | <input type="checkbox"/> Other: _____ |
| <input type="checkbox"/> Vacation | _____ |

The amount of your claim: _____

To the extent you have documentation to support your claim, please include such documents with your response.

If your action relates to a pending or closed legal action, indicate all the information and documentation requested in the section "FOR A LEGAL ACTION" above.

FOR OTHER TYPES OF CLAIMS:

Describe the basis for your claim: Damages and Harm, IDEA Federal Act and State Law 51-1996

The amount of your claim: \$150,000.00 per claimant

To the extent you have documentation to support your claim, please include such documents with your response.

L-HR-U

Prime Clerk LLC
(844) 822-9231 PRClaimsInfo@primeclerk.com

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Claimant's Name: **[Redacted]**

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- ☐ A pending or closed legal action with or against the government of Puerto Rico
- ☐ Current or former employment with the Government of Puerto Rico
- ☒ Other (please describe): Claim for Damages against the Department of Education and the Government of Puerto Rico (Special Education Lawsuit)
- ☐

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Identify the name and address of the court or agency where the action is pending: Trial Court of San Juan, Room 805

Case Number: KPE 1980-1738

Title, Caption, or Name of Case: Rosa Lydia Vélez et al v. Dept. of Education et al (Special Ed Lawsuit)

Status of the Case (pending, on appeal, or concluded): Pending

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FOR CURRENT OR PRIOR EMPLOYMENT:

Specific agency or department where you were or are employed: _____

Specific period of prior or present employment related to your claim: _____

Last four digits of your social security number: _____

[continues in the back]

Nature of your employment claim:

- | | |
|---------------------------------------|---|
| <input type="checkbox"/> Retirement | <input type="checkbox"/> Union Grievance |
| <input type="checkbox"/> Unpaid Wages | <input type="checkbox"/> Pending or closed legal action |
| <input type="checkbox"/> Sick Days | <input type="checkbox"/> Other: _____ |
| <input type="checkbox"/> Vacation | _____ |

The amount of your claim: _____

To the extent you have documentation to support your claim, please include such documents with your response.

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FOR OTHER TYPES OF CLAIMS:

Describe the basis for your claim: Damages and Harm, IDEA Federal Act and State Law 51-1996

The amount of your claim: \$150,000.00 per claimant

To the extent you have documentation to support your claim, please include such documents with your response.

ROSA LYDIA VÉLEZ ET AL
Plaintiff
v.
DEPARTMENT OF EDUCATION
ET AL
Defendants

CIVIL No.: **K PE1980-1738 (805)**
SUBJECT:
CLASSIC INJUNCTION
DAMAGES
SPECIAL EDUCATION CASE

CLAIM

DAMAGES PHASE ROSA LYDIA VÉLEZ v. DEPR

To the Special Commissioner:

Mr. Carlos Rivera Martínez

Commissioner

PO Box 1713 Caguas,

Puerto Rico 00726-1713

E-mail: comisionado.ed.especial@gmail.com

Name of special education child or youth:

ARMANDO SANGENIS VELAZQUEZ WILSON

Registration number (if known):



3352

Student Information System (SIE) Number:



8036

Date of Birth:



-2000

Name of School:

PADRE RUFO FERNANDEZ BAYAMON

Bayamon

Mother:

STEPHANIE H. WILSON CRESPO

Father:

ARMANDO VELAZQUEZ ALLENDE

Guardian:

Mother

Caregiver:

Mother

Relationship of Caregiver

MOTHER

Address:

CALLE 21X14 URB. MAGNOLIA GARDENS BAYAMON

Address 2:

SAME

Municipality:

Bayamon

State/Country:

Puerto Rico

Zip Code:

00956

Telephone:

(787) 9068992

Fax:

(787) 3804971

Email:

WILSONSTEPHANIE62@gmail.com

Brief Summary:

MY SON HAS NOT RECEIVED SPECIAL EDUCATION THERAPY FOR TWO YEARS SINCE HE MOVED FROM THE OTHER SCHOOL. THEY DENIED HIM THE HEARING TEST BECAUSE THEY WOULDN'T PAY FOR IT. HE IS SEEN AT APS, TAKING MEDICATION FOR HIS CONDITION. HE IS UNDER THE CARE OF A PSYCHOLOGIST AND PSYCHIATRIST. HE IS HYPERACTIVE AND AGGRESSIVE. HE HAS FAILED TWICE. SINCE VERY YOUNG HE HAS BEEN IN EARLY INTERVENTION AND TREATMENTS. EVERY THERAPY ASSESSMENT TAKES MORE THAN A YEAR. HIS ASSESSMENTS HAVE TAKEN TOO LONG. HE HAS BEEN AT A PSYCHIATRIC HOSPITAL DUE TO HIS AGGRESSION.

Diagnosis

Emotional Disturbances

Hearing Impaired

Speech and Language Issues

Specific Learning Disability

Educational services not provided:

Reassessment

Therapies (not received)

Occupational

TAKES MEDICATION AT APS. DEPRESSION, HYPERACTIVITY, COMPULSIVENESS/

Financial losses

Special Education Children and Youth

Submission Date 10-27-2016 12:15:25

**COMMONWEALTH OF PUERTO RICO
TRIAL COURT
SUPERIOR COURT OF SAN JUAN**

ROSA LYDIA VÉLEZ ET AL
Plaintiff
v.
DEPARTMENT OF EDUCATION
ET AL
Defendants

CIVIL No.: K PE1980-1738 (805)

SUBJECT:

CLASSIC INJUNCTION
DAMAGES
SPECIAL EDUCATION CASE

CLAIM

DAMAGES PHASE ROSA LYDIA VÉLEZ v. DEPR

To the Special Commissioner:

Mr. Carlos Rivera Martínez

Commissioner

PO Box 1713

Caguas, Puerto Rico 00726-1713

E-mail: comisionado.ed.especial@gmail.com

1. Name

Name of special education child or youth:

HADASSALIZ VELAZQUEZ WILSON

Registration number:

8013

Student Information System (SIE) Number:

3098

2. Date of Birth

Date of Birth

-2001

Name of School

PADRE RUFO FERNANDEZ BAYAMON

Municipality

Bayamon

3. Other Claimants

Full name of mother, father, guardian or Caregiver who are also claimants:

Mother

STEPHANIE H. WILSON CRESPO

Father

ARMANDO VELAZQUEZ ALLENDE

Guardian

MOTHER

Caregiver

MOTHER

Relationship of Caregiver

MOTHER

Address CALLE 21 X 14 URB. MAGNOLIA GARDENS BAYAMON PR
Address 2 SAME
Municipality Bayamón
State/Country Puerto Rico
Zip Code 00956
Telephone (787) 9068992
Fax (787) 3804971
Email WILSONSTEPHANIE62@gmail.com

5. Brief Summary

Brief summary of the child's or youth's condition, including diagnosis and direct or related special education services that have not been or are not being provided.

Brief Summary MY DAUGHTER HAS NOT RECEIVED THERAPY FOR TWO YEARS SINCE SHE MOVED FROM THE OTHER SCHOOL. THE PAPERWORK WAS PROCESSED OVER A YEAR AGO. SHE HAS BEEN IN EARLY INTERVENTION SINCE VERY YOUNG DUE TO HER CONDITION (SHE HAD AUTISTIC FEATURES). SHE IS CURRENTLY UNDER THE CARE OF A PSYCHOLOGIST AND PSYCHIATRIST AT APS AND TAKES MEDICATION. SHE FAILED THREE TIMES. SHE HAD NO SPECIAL EDUCATION TEACHER AT SCHOOL.

Diagnosis Emotional Disturbances

Educational services not provided: Assessment

Therapies (not received) Speech and language
Psychological
Occupational
Other

6. Damages claimed...

Damages claimed on behalf of the special education child or youth, as well as damages to the father, mother, guardian, or Caregiver. You must specify the damages suffered by each claimant. Select and specify.

Claimants (you may select more than one)

Special Education Children and Youth
Mother
Caregiver / Guardian

Physical Damages

Specify FAILED THREE YEARS. THEY DID NOT WANT TO ADMINISTER PLACEMENT TESTS.

Mental and/or emotional distress

Specify TAKES MEDICATION AT APS. DEPRESSION, HYPERACTIVITY,
COMPULSIVENESS

Select all that apply Economic losses

Learning Damages: Delayed graduation date
Learning delays

Expenses: Transportation expenses.

7. Identify your representation

Identify your legal representation The class representatives in the injunctive phase are authorized to
(Choose an alternative) represent us in the damages phase.

Any requests that (1) are postmarked (if mailed via postal service) or dated (if sent via email) after October 31, 2016, and/or (2) fail to contain all the information requested herein, shall not be accepted for inclusion into the damages claim.

Your claim will be sent to the email address of the Special Commissioner, Mr. Carlos Rivera Martínez. By submitting the form, you will also receive a confirmation sent to your email address (if included), and a PDF file of the form received.

Submission Date 10-27-2016 11:52:24

**COMMONWEALTH OF PUERTO RICO
TRIAL COURT
SUPERIOR COURT OF SAN JUAN**

ROSA LYDIA VÉLEZ ET AL
Plaintiff
v.
DEPARTMENT OF EDUCATION
ET AL
Defendants

CIVIL No.: K PE1980-1738 (805)

SUBJECT:

CLASSIC INJUNCTION
DAMAGES
SPECIAL EDUCATION CASE

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DAMAGES PHASE ROSA LYDIA VÉLEZ v. DEPR

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Commissioner

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Caguas, Puerto Rico 00726-1713

E-mail: comisionado.ed.especial@gmail.com

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Name of special education child or youth:

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Registration number:

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Student Information System (SIE) Number:

8036

2. Date of Birth

Date of Birth

-2000

Name of School

PADRE RUFO FERNANDEZ BAYAMON

Municipality

Bayamon

3. Other Claimants

Full name of mother, father, guardian or Caregiver who are also claimants:

Mother

STEPHANIE H. WILSON CRESPO

Father

ARMANDO VELAZQUEZ ALLENDE

Guardian

MOTHER

Caregiver

MOTHER

Relationship of Caregiver

MOTHER

Address CALLE 21 X 14 URB. MAGNOLIA GARDENS BAYAMON
Address 2 SAME
Municipality Bayamon
State/Country Puerto Rico
Zip Code 00956
Telephone (787) 9068992
Fax (787) 3804971
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Brief summary of the child's or youth's condition, including diagnosis and direct or related special education services that have not been or are not being provided.

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Diagnosis Emotional Disturbances
Hearing Impaired
Speech and Language Issues
Specific Learning Disability

Educational services not provided: Reassessment

Therapies (not received) Occupational

6. Damages claimed...

Damages claimed on behalf of the special education child or youth, as well as damages to the father, mother, guardian, or Caregiver. You must specify the damages suffered by each claimant. Select and specify.

Claimants (you may select more than one)

Special Education Children and Youth
Mother
Caregiver / Guardian

Physical Damages

Specify FAILED TWICE

Select all that apply Economic losses

Learning Damages: Delayed graduation date
 Academic delay
 Learning delays

Expenses: Transportation expenses.

7. Identify your representation

Identify your legal representation The class representatives in the injunctive phase are authorized to
(Choose an alternative) represent us in the damages phase.

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Plaintiff
v.
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Puerto Rico 00726-1713

E-mail: comisionado.ed.especial@gmail.com

Name of special education child or youth:

HADASSALIZ VELAZQUEZ WILSON

Registration number (if known):

8013

Student Information System (SIE) Number:

3098

Date of Birth:

-2001

Name of School:

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Bayamón

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Father:

ARMANDO VELAZQUEZ ALLENDE

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MOTHER

Caregiver:

MOTHER

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Speech and Language

Psychological

Occupational

Others

TAKES MEDICATION AT APS

Economic losses

Special Education Children and Youth

Mother

Caregiver / Guardian

Select all that apply

Learning Damages:

Delayed graduation date

Academic delay

Learning delays

Expenses:

Transportation expenses.

Identify your legal representation (Choose an alternative)

The class representatives in the injunctive phase are authorized to represent us in the damages phase.

Other legal representation

Confirmation Number:

353394125281606364

Mother
Caregiver / Guardian

Select all that apply

Learning Damages:

Delayed graduation date
Learning delays

Expenses:

Transportation expenses.

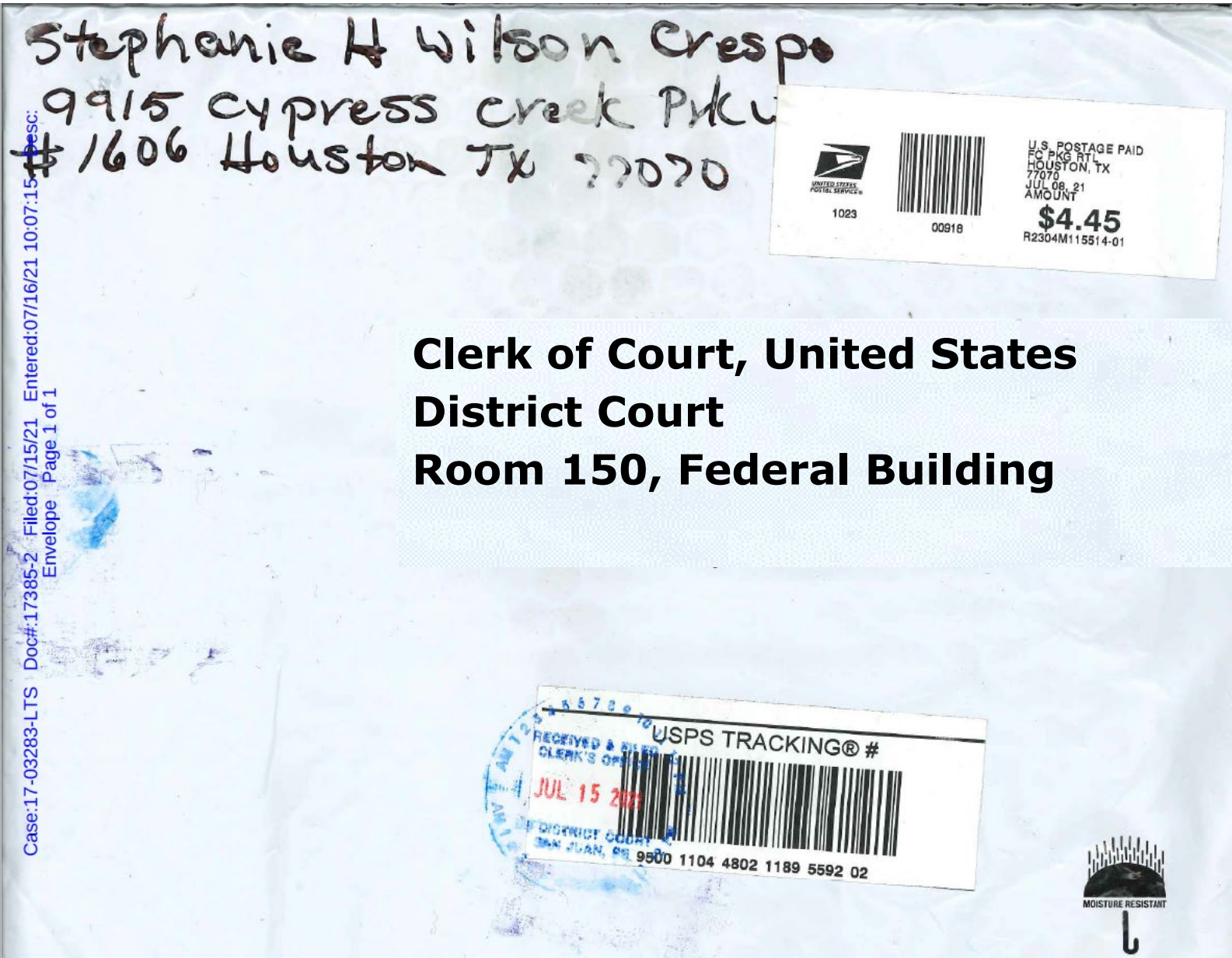
Identify your legal representation (Choose an alternative)

The class representatives in the injunctive phase are authorized to represent us in the damages phase.

Other legal representation

Confirmation Number:

353392744281841651





T 718.384.8040
W TargemTranslations.com
E projects@targemtranslations.com
A 185 Clymer St. Brooklyn, NY 11211

TRANSLATOR'S CERTIFICATE OF TRANSLATION

Translation from: Spanish (Puerto Rico) into English (US)

TARGEM Translations Inc.

I, Andreea I. Boscor, ATA-certified Spanish-English #525556, acting as translator at TARGEM Translations Inc., a NEW YORK City corporation, with its principal office at 185 Clymer Street, Brooklyn, NY, 11211, USA, certify that:

the English translated document is a true and accurate translation of the original Spanish and has been translated to the best of my knowledge.

Original Document Name: **Claim No. 87771 DN 17385**

Signed this 15th day of December, 2021



Verify at www.atanet.org/verify

A handwritten signature in blue ink, appearing to read 'Andreea I. Boscor'.

Andreea I. Boscor

